

**PHILIP SHROPSHIRE,** )  
 )  
 **Plaintiff,** )  
 )  
 **vs.** ) **C.A. No. 2:17-cv-00935-DSC**  
 )  
 **CHRIS GALLAWAY, ZACHARY** )  
 **REIDER and FIELDWORKS, LLC,** )  
 )  
 **Defendants.** )

Defendants, Fieldworks, LLC (“Fieldworks”), Chris Gallaway (“Gallaway”) and Zachary Reider (“Reider”) (collectively, “Defendants”), by their attorneys, Cohen & Grigsby, P.C., file the following Defendants’ Unopposed Motion to Extend Time To Respond to Plaintiff’s Second Amended Complaint, and in support thereof state as follows:

- 3000041.v1

5. Defendants, however, require additional time to evaluate the allegations and claims in the Second Amended Complaint to prepare a response thereto.

6. Defendants certify that they have conferred with Plaintiff regarding an extension.

7. On April 10, 2019, Defendants requested from Plaintiff a 30-day extension of time to respond to Plaintiff's Second Amended Complaint, i.e., until May 16, 2019, and Plaintiff did not object. See email from Attorney Kelsey Gdovin to Pro Se Plaintiff Philip Shropshire dated April 10, 2019, a true and correct copy of which is attached hereto as Exhibit "1."

8. Defendants respectfully request that the Court issue an Order that grants a 30-day extension to respond to the Second Amended Complaint, i.e., until May 16, 2019, in accordance with the parties' acknowledgment of the same.

9. The motion is made for good cause and is not for the purpose of delay. Granting the motion will not prejudice Plaintiff as he has already indicated that he does not oppose the extension.

WHEREFORE, Defendants respectfully request that the Court grant the Defendants' Unopposed Motion For Extension Of Time To Respond to Plaintiff's Second Amended Complaint in accordance with the proposed Order.

Respectfully submitted,

/s/ Jennifer S. Park

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Counsel for Defendants

Dated: April 15, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Defendants' Unopposed Motion For Extension Of Time To Respond To Plaintiff's Second Amended Complaint** was filed electronically on April 15, 2019. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Jennifer S. Park